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(D. P. Roman)

September 6, 2005

Honorable Donald E. Powell, Chairman
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429

Mr. John F. Carter, Regional Director
Federal Deposit Insurance Corporation
25 Jessie Street at Ecker Square, Suite 2300
San Francisco, CA 94105

**IN RE: Comments Regarding FDIC Application #20051977; Wal-Mart Application
For Insurance and Industrial Bank Charter**

As a community bank, we oppose Wal-Mart's application for FDIC insurance coverage and an industrial bank charter. Sevierville, Tennessee has a Super Wal-Mart, and we believe the following statements to be true.

We believe banking and commerce are oil and water and cannot be mixed. To do so is bad public policy that could jeopardize the impartial allocation of credit and will create conflicts of interest. Congress reaffirmed its opposition to the mixing of banking and commerce in the Gramm-Leach-Bliley Act. Allocation of credit is not a commodity. If the federal and state authorities could not prevent Wal-Mart's use of illegal labor, how can they ensure a Wal-Mart Bank does not adversely evaluate small businesses competing against Wal-Mart or favors Wal-Mart suppliers in credit decisions? What recourse would the small businessperson have, go to court and sue? They'd be out of business before the trial date was set. Also, just imagine the strong-armed leverage Wal-Mart has "requesting" its suppliers to bank with the Wal-Mart Bank.

As studies and history have shown, adding a Wal-Mart store to a community tends to disrupt the local economics and has even de-stabilized a few. With its vast resources, it could drive out community banks like it has driven out community grocery stores, pharmacies, and hardware stores. Where would that leave our communities? When is the last time any of you went to a Wal-Mart for a significant LOCAL donation?

The systemic risk posed by a Wal-Mart bank would be enormous. Wal-Mart already controls 8% of the non-restaurant, non-automotive sales in the U.S. A Wal-Mart Bank in every store would represent a dangerous and unprecedented concentration of economic decision-making and power, and what about credit self-dealing?

Community banks are already competing fiercely, dealing with technology and terrorism issues and dealing daily with increasingly massive regulatory burdens, not to mention having faced the unfair playing field with credit unions on income tax issues for years. We had been hopeful that relief legislation on these issues was working its way through but instead we now must fight the potential of competing with Wal-Mart!

If Wal-Mart is allowed to enter the already very competitive financial services arena, it is logical that many institutions will not be able to survive cutting the pie into smaller and smaller slices. Community Banks and bankers fill special needs wherever we operate. We do our best to be good community citizens and want to continue to serve our customers and communities. Please do not allow Wal-mart's application for an Industrial Bank Charter to be passed!

Respectfully yours,

A handwritten signature in dark ink, appearing to read "Chuck Atchley", with a stylized flourish at the end.

Chuck Atchley
Executive Vice President